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1 /	UNITED STATES	DISTRICT COURT
18 19		LIFORNIA, SAN JOSE DIVISION
20	ADAM ROSH, individually, on behalf of	Case No. 5:13-cv-03751-RMW
21	others similarly situated, and on behalf of the general public,	STIPULATION AND [] ORDER TO ADJUST CASE
22	Plaintiff,	MANAGEMENT SCHEDULE
23	VS.	Case Management Conference
24	INDEED, INC.,	Date: May 2, 2014
25	Defendant.	Time: 10:30 a.m. Judge: Hon. Honorable Ronald M. Whyte Crtrm: 6
26		
27		Complaint filed: August 13, 2013
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STIPULATION AND [] ORDER TO ADJUST CASE MANAGEMENT SCHEDULE

1	Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, Local Rule 6-2, and Local
2	Rule 7-12, Plaintiff Adam Rosh ("Rosh") and Defendant Indeed, Inc. ("Indeed") hereby stipulate
3	and respectfully request that the Court vacate the case management conference in this matter. The
4	parties have reached a settlement in principle, and anticipate filing a motion for settlement
5	approval shortly with the Court.
6	WHEREAS, Rosh filed a Class and Collective Action Complaint in this matter on August
7	13, 2013 (Dkt. No. 1);
8	WHEREAS, on September 17, 2013, the Court ordered that the parties submit a Joint
9	Case Management Statement by December 6, 2013, and set a Case Management Conference for
10	December 13, 2013 (Dkt. No. 15);
11	WHEREAS, Indeed filed an Answer to the Class and Collective Action Complaint on
12	October 4, 2013 (Dkt. No. 16);
13	WHEREAS, the parties agreed in the Stipulation and Order entered by this Court on
14	November 19, 2013, to submit this case to private mediation to be completed by March 31, 2014
15	(Dkt. No. 19);
16	WHEREAS, in the joint case management statement submitted on November 26, 2013,
17	the parties agreed to postpone all discovery in this matter until after the conclusion of mediation;
18	WHEREAS, this Court entered an order continuing the Case Management Conference
19	until April 25, 2014 (Dkt. 22), and subsequently rescheduled the conference for May 2, 2014
20	(Dkt. 31);
21	WHEREAS, the parties engaged in private mediation on March 14, 2014 and reached an
22	agreement in principle to settle this case; and
23	WHEREAS, the parties are working on drafting the final settlement agreement, approval
24	papers, and supporting documentation, and intend to file a joint motion for settlement approval in
25	the near future;
26	THEREFORE, Plaintiff Rosh and Defendant Indeed, through the undersigned counsel,
27	hereby stipulate and request that the Court vacate the Case Management Conference in this matter
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1	in light of the parties' plan to submit a motion for settlement approval. The parties will seek a	
2	hearing with this Court to consider the parties' motion for settlement approval.	
3		
4	Respectfully submitted,	
5		
6	Dated: April 25, 2014 ADAM W. HANSEN NICHOLS KASTER LLP	
7		
8	By:/s/Adam W. Hansen	
9	ADAM W. HANSEN	
10	Attorneys for Plaintiff ADAM ROSH	
11		
12		
13	Dated: April 25, 2014 Munger, Tolles & Olson LLP MALCOLM A. HEINICKE	
14	KATHERINE M. FORSTER JESLYN A. MILLER	
15		
16	By: /s/Katherine M. Forster	
17	KATHERINE M. FORSTER	
18	Attorneys for Defendant, INDEED, INC.	
19		
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21	CI ODDED	
22	[] ORDER	
23	Pursuant to the stipulation of counsel, IT IS SO ORDERED.	
24	Dated: 1 Dated: Ronald M. Whyte The Honorable Ronald M. Whyte	
25	The Honorable Ronald M. Whyte District Judge V@ÁÔ[ˇ¦ơ⁄&[} æ³ ઁ^• Ás@ÁÔæ• △ÁT æ} æ* ^{ ^}ơ⁄Ô[} △√¦^} &^Á[ÁK Á* Á*FÉÆÆFI ÁæÁF€KHEÁæÈ; È	
26	V@ Ájædæð•Ág Áðj^ÁæÁ, [cō]}Ág¦Áj¦^ ðj ðjæð^Áæð]];[çæþÁ, Án^cd^{ ^} cÁ, ¦ðj¦Ág ÁR' ^ÁFFÉÆG€FI	
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	C-13-03751 RMW - 2 - STIPULATION AND [] ORDER TO	